Ms. Jamie Zech,
SIP Project Manager
MC 206, Air Quality Division
Chief Engineer’s Office
Texas Commission on Environmental Quality
Austin, Texas 78711-3087

RE: TCEQ’s Proposed SIP Revisions for the DFW Nonattainment Area for the 1997 Eight-Hour Ozone Standard

Dear Ms. Zech:

The Regional Transportation Council (RTC), the Metropolitan Planning Organization (MPO) for the Dallas-Fort Worth (DFW) area, appreciates the opportunity to review and comment on the Texas Commission of Environmental Quality’s (TCEQ) Proposed Dallas-Fort Worth Attainment Demonstration (2010-022-SIP-NR) and Reasonable Further Progress (2010-023-SIP-NR) State Implementation Plan Revisions for the 1997 Eight-Hour Ozone Standard Nonattainment Area, including corresponding supplements. The RTC’s 43 members include local elected or appointed officials from the metropolitan area and representatives from each of the area’s transportation providers. The RTC oversees the metropolitan transportation planning process for a 12-county urbanized area in North Central Texas. Attachment 1 contains a Committee roster. The following are our comments and recommendations:

EMISSION BENEFITS ASSOCIATED TO TRANSPORTATION PROJECTS

On October 14, 2010, the RTC approved and on February 2, 2011, NCTCOG staff forwarded to TCEQ (Attachment 2) for the inclusion of all transportation emission reduction projects and programs, including Transportation Control Measures committed in previous SIP’s, to be placed into the non-regulatory Weight-of-Evidence (WOE) Section of the DFW SIP revision and communicated this action to TCEQ staff shortly thereafter. Upon review of the proposed SIP revision and corresponding supplements, transportation initiatives have been documented in the section where legally binding emission reduction strategies and associated emission benefits are generally incorporated and used to estimate motor vehicle emission budgets (MVEB). The RTC respectively requests that these transportation initiatives be reallocated from their current placement and moved into the WOE and adjust, if necessary, the MVEB’s to accurately reflect proper intent and reporting of these initiatives. This reallocation will not eliminate current or future transportation initiatives aimed at reducing vehicular emissions in the region, but rather classify these initiatives in a way that will allow flexible accountability if priority changes occur.

The RTC is also requesting that the SIP revision documents clearly states that the proposed MVEB have been established without taking any emission credits from transportation projects and programs and that those transportation measures listed in the WOE are provided in good
faith and identify significant investments and continual commitment by the RTC to reduce vehicular emissions. Please double check the proposed and supplemental DFW SIP revision documents in their entirety to ensure transportation initiatives are adjusted to reflect their WOE identification.

INCORPORATION OF EPA’S NEW MOVES2010 ON-ROAD EMISSIONS SIMULATOR

On February 10, 2011, the Regional Transportation Council (RTC) sent a letter to your agency (Attachment 3) summarizing future transportation conformity consequences if the Environmental Protection Agency’s (EPA) new Motor Vehicle Emission Simulator (MOVES2010) was not immediately utilized and requested on-road mobile emission estimates from this new model be incorporated into the DFW reclassification SIP. The RTC appreciates and supports TCEQs decision to incorporate the MOVES2010 model into the reclassification SIP. By doing so, appropriate MVEBs can be established and allow future conformity determinations be based on the true meaning of what Congress intended when they incorporated transportation conformity into the Clean Air Act. In other words, future transportation conformity evaluations would be based on latest multi-modal transportation investment decisions rather than results between the use of two different versions of emission software. Additional benefits of utilizing MOVES2010 allows more realistic emission estimates as this model incorporates latest information such as vehicle technologies and behavioral trends, recent SIP revision photochemical modeling performs at an improved tolerance within EPA’s guidelines, allows for better decision making, and represents an improved assessment of emission trends to the public.

Thank you for the opportunity to comment on the proposed DFW attainment demonstration and reasonable further progress SIP revision documents. If you have any questions, please contact Michael Morris at (817) 695-9241 or Chris Klaus at (817) 695-9286.

Sincerely,

Jungus Jordan
Chair, Regional Transportation Council
Councilmember, City of Fort Worth

MV:ch
Attachments

cc: The Honorable Mark Burroughs, Chair, North Texas Clean Air Steering Committee; Mayor, City of Denton;
    Mike Eastland, Executive Director, NCTCOG
    Michael Morris, P.E., Director of Transportation, NCTCOG
    Chris Klaus, Senior Program Manager, NCTCOG